

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LASHEENA SIPP-LIPSCOMB and ANDRES
GARDIN, SR., Individually and in their own right as
P/N/G of A.G., Jr., a minor

Plaintiff(s)

v.

EINSTEIN PHYSICIANS PENNYPACK
PEDIATRICS; ALBERT EINSTEIN HEALTHCARE
NETWORK; ST. CHRISTOPHER'S HEALTHCARE,
LLC; AMERICAN ACADEMIC HEALTH SYSTEM,
LLC f/d/b/a ST. CHRISTOPHER'S HOSPITAL FOR
CHILDREN; PHILADELPHIA ACADEMIC HEALTH
HOLDINGS, LLC; PHILADELPHIA ACADEMIC
HEALTH SYSTEM, LLC; ERIN E. HASSEL, MD;
PRAMATH NATH, MD; UROLOGY FOR
CHILDREN, LLC; CHARLES W. CONCODORA,
MD; HAYLEY BARTKUS; ERIC Y. CHO, MD;
ARJUN KALYANPUR, MD and TELERADIOLOGY
SOLUTIONS, P.C.

Defendant(s)

CIVIL ACTION

NO.: 20-cv-01926-MMB

TRIAL EXHIBITS LIST OF CO-DEFENDANTS,
ARJUN KALYANPUR, MD AND TELERADIOLOGY SOLUTIONS, PC

I. EXHIBIT LIST

1. Records of Teleradiology Solutions;
2. Records of Einstein Physicians Pennypack Pediatrics;
3. Records of St. Christopher's Hospital for Children;
4. Records of Albert Einstein Medical Center;
5. Records of Urology for Children;
6. Records of Tampa Pediatrics;
7. Records of St. Joseph's Hospital;
8. Records of St. Christopher's Hospital, Dept. of Audiology;
9. Records of Tri County Pediatrics;

10. Records of CHOP Pediatric Urology;
11. Records of Nazareth Hospital;
12. Records of Keystone First;
13. Records of Department of Human Services;
14. Deposition transcripts of Lasheena Sipp-Lipscomb, including exhibits;
15. Deposition transcript of Andres Gardin, Sr., including exhibits;
16. Deposition transcript of Arjun Kalyanpur, M.D., including exhibits;
17. Deposition transcript of Eric Y. Cho, M.D., including exhibits;
18. Deposition transcript of Hayley Bartkus, including exhibits;
19. Deposition transcript of Erin E. Hassel, M.D., including exhibits;
20. Deposition transcript of Pramath Nath, M.D., including exhibits;
21. Deposition transcripts of Erica Poletto, M.D., including exhibits;
22. Deposition transcript of Charles Concordora, M.D., including exhibits;
23. Deposition transcript of Pat Brown, including exhibits;
24. Deposition transcript of Allyson McDonnel, RN, including exhibits;
25. Deposition transcript of Frances Barlow, RN, including exhibits;
26. Deposition transcript of Patricia Madison, RN, including exhibits;
27. Expert report(s) and curriculum vitae of Scott B. Berger, M.D., including all items listed
in Appendix A, "Material Reviewed";
28. Expert report(s) and curriculum vitae of Adam B. Hittelman, M.D., including all items
listed at pages 1 and 2 of Dr. Hittelman's report;
29. Expert report(s) and CV of Richard L. Oken, M.D.;
30. Expert report(s) and CV of Ardavan Akhavan, M.D.;

31. Expert report(s) and CV of Daniel A. Rauch, M.D.;
32. Expert report(s) and CV of Pasquale Casale, M.D.;
33. Expert report(s) and CV of Richard I. Markowitz, M.D.;
34. Expert report(s) and CV of Pasquale Patrizio, M.D.;
35. Expert report(s) and CV of Adam R. Hecht, M.D.;
36. Expert report(s) and CV of Andrew Jared Kirsch, M.D.;
37. Expert report(s) and CV of Jonathan C. Routh, M.D.;
38. Expert report(s) and CV of John Wiener, M.D.;
39. Expert report(s) and CV of Matthew Eisenberg, M.D.;
40. Expert report(s) and CV of Steven Blumer, M.D.;
41. CV of Defendant Arjun Kalyanpur, M.D.;
42. Teleradiology Solutions Services Agreement (P-119);
43. Kalyanpur et al's Objections and Responses to Plaintiff's Request for Documents ("RFD");
44. Kalyanpur et al's Supplemental Responses to Plaintiff's RFD;
45. Kalyanpur et al's Supplemental Responses to Discovery Pursuant to Deposition;
46. Kalyanpur et al's Objections and Responses to Plaintiff's Interrogatories and RFD regarding Affirmative Defenses;
47. Kalyanpur et al's Responses to Plaintiff's Supplemental RFD;
48. Preliminary US Report with Addendum (P-12);
49. Consult Report (P-13);
50. QA report (P-24);
51. QA metadata (P-25);
52. Exam Record Access Report 5544003, 7/24/2019 (P-42);

- 53. Exam Record Access Report 5544004, 7/24/2019 (P-43);
- 54. Exam Record Access Report 5544216, 7/24/2019 (P-125);
- 55. RIS Photos (P-44);
- 56. Any and all radiology and diagnostic studies of Plaintiffs' Minor;
- 57. Any and all laboratory studies, tests and results pertaining to Plaintiffs' Minor;
- 58. Any literature, articles or publications relied upon by any expert(s) in formulating his/her opinions or preparing his/her expert reports;
- 59. St. Christopher's Hospital for Children policies and procedures, including but not limited to policies/procedures relating to emergency room care;
- 60. Medical literature, including but not limited to testicular torsion;
- 61. Any models, computer images, graphics, diagrams, animation or images;
- 62. Enlargement of any Exhibit(s);
- 63. Chronology or timeline of events;
- 64. Any Exhibit(s) listed in Plaintiffs' Trial Exhibits;
- 65. Any Exhibit(s) listed in Codefendants' Trial Exhibits; and
- 66. Defendant reserves the right to supplement this Exhibit List up to and through the time of trial.

RESPECTFULLY SUBMITTED,
KIERNAN TREBACH LLP



GEORGE L. YOUNG, ESQUIRE
Attorney ID No. 26221
*Attorney for Defendants, Arjun Kalyanpur, MD and
Teleradiology Solutions, P.C.*

Date: November 1, 2022

CERTIFICATE OF SERVICE

I, George L. Young, Esquire, hereby certify that a true and correct copy of the foregoing Trial Exhibits List of Defendants, Arjun Kalyanpur, MD and Teleradiology Solutions, P.C. was forwarded via the Court's Electronic Filing System upon the following:

COUNSEL FOR PLAINTIFF

David E. Jokelson, Esquire
Derek E. Jokelson, Esquire
JOKELSON LAW GROUP, P.C.
230 S. Broad Street, 10th floor
Philadelphia, PA 19102

**COUNSEL FOR EINSTEIN PHYSICIANS PENNYPACK PEDIATRICS AND ALBERT EINSTEIN
HEALTHCARE NETWORK**

Joseph G. Zack, Esquire
POST & POST, LLC
920 Cassatt Road, Suite 102
Berwyn, PA 19312

**COUNSEL FOR ST. CHRISTOPHER'S HEALTHCARE, LLC; AMERICAN ACADEMIC HEALTH
SYSTEM, LLC; PHILADELPHIA ACADEMIC HEALTH HOLDINGS, LLC; PHILADELPHIA ACADEMIC
HEALTH SYSTEM, LLC; ERIN E. HASSEL, M.D.; PRAMATH NATH, M.D.; AND HAYLEY BARTKUS**

Gary M. Samms, Esquire
Katherine Robinson, Esquire
OBERMAYER REBMANN MAXWELL & HIPPEL LLP
1500 Market Street
Center Square West – 34th Floor
Philadelphia, PA 19102

COUNSEL FOR UROLOGY FOR CHILDREN, LLC AND CHARLES W. CONCODORA, M.D.

John P. Shusted, Esquire
Nikki Mosco, Esquire
GERMAN GALLAGHER & MURTAGH, PC
200 South Broad Street, Suite 500
Philadelphia, PA 19102

COUNSEL FOR ERIC Y. CHO, M.D.

E. Chandler Hosmer, III, Esquire
Jacqueline M. Reynolds, Esquire
MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN
620 Freedom Business Center, Suite 300
King of Prussia, PA 19406

A handwritten signature in black ink, appearing to be 'G. Young', written over a horizontal line.

By: _____
GEORGE L. YOUNG, ESQUIRE

Date: November 1, 2022